

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York.

UNITED STATES OF AMERICA)

v.)

CAMERON ROBINSON)

Defendant)

Case No. 1:22-MJ-217-DJS

U.S. DISTRICT COURT - N.D. OF N.Y.

FILED

May 07 - 2022

John M. Domurad, Clerk

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

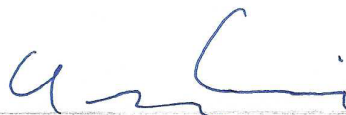
On or about the date(s) of May 4, 2022 in the county of Rotterdam in the Northern District of New York the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Prohibited person (felon) in possession of a firearm

This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

ATF SA Young Choi

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: May 7, 2022



Judge's signature

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title

City and State: Albany, New York

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT**

I, Young Choi, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging Cameron ROBINSON (“ROBINSON”) with a violation of Title 18, United States Code, Section 922(g)(1)(Possession of a Firearm and/or Ammunition by a Prohibited Person).
2. I am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms & Explosives (“ATF”), and have been so employed since September 2012. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, GA, and the ATF Special Agent Basic Training Program at the ATF National Academy also located in Glynco.
3. Prior to my employment with ATF, I was a military prosecutor and defense attorney with the United States Marine Corps, and also worked as a Traffic Safety Resource Prosecutor for the State of New York. My duties at ATF include the investigation of federal firearm violations and related crimes. I have extensive experience, both as a prosecutor and federal agent, in the area of violations of Title 18 of the United States Code, to specifically include federal firearms offenses.
4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other Law Enforcement Officers and witnesses. This affidavit is intended to show only that there is sufficient probable cause for the requested

criminal complaint and does not set forth all of my knowledge about this matter. I have set forth only the facts that I believe are necessary to establish probable cause to believe that ROBINSON violated Title 18, United States Code, Section 922(g)(1).

5. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that a violation of Title 18, United States Code, Section 922(g)(1) (felon in possession of firearm and/or ammunition), has been committed by ROBINSON.

PROBABLE CAUSE

6. At approximately 4:54 AM on May 4, 2022, D.M. – a person whose identify is known to law enforcement officials and who resides at [REDACTED], Rotterdam, NY (“D.M.’s Residence”) – placed a 911 call stating words to the effect that she used a gun to defend herself and that Cameron ROBINSON was running. Additional callers to 911 also reported hearing a gunshot, and Rotterdam Police Department (RPD) responded to the scene of the alleged shooting.

7. Responding RPD officers observed ROBINSON outside D.M.’s Residence. They provided medical attention to a gunshot wound located on his arm, and ROBINSON was then transported to Albany Medical Center (“AMC”) in Albany, NY.

8. That same morning, RPD obtained and executed a New York State Search Warrant for D.M.’s Residence and recovered a Taurus, Model G2C, 9mm, semiautomatic pistol, bearing SN: ACH152233. Your affiant confirmed that the above-mentioned Taurus firearm was purchased by a third party whose identity is known to law enforcement on or about October 26, 2021, at a Federal Firearms Licensee located in Belmont, NC. A records search revealed that the third party is a resident of North Carolina.

9. Also on May 4, 2022, RPD Detective Lee interviewed D.M. at RPD. Following advisement and waiver of her *Miranda Rights*, D.M. stated, in sum and substance, that ROBINSON traveled from North Carolina to D.M.'s Residence on or about April 23, 2022 to visit and stay with D.M. D.M. explained that ROBINSON showed her his firearm the first day he arrived in NY and stated that he brought the firearm with him for protection because he did not know anyone in NY.


10. On May 6, 2022, SA Young Choi and RPD Detective Connor Lee met with ROBINSON in his patient room at AMC with a Federal Search Warrant for ROBINSON's cellphone. The nurses explained to your affiant that ROBINSON was sitting in a chair, talkative, and eating lunch. Your affiant and Detective Lee met with ROBINSON, and he was attentive and articulate. Your affiant and Detective Lee explained to ROBINSON that they had a federal search warrant for the defendant's phone, and ROBINSON was informed that he was not in custody, not under arrest, and was free to leave or have police leave at any time, which ROBINSON acknowledged. ROBINSON admitted that the Taurus firearm recovered from D.M.'s Residence is his, that he purchased it in 2021, and that he brought it to New York from North Carolina for protection because he did not know anyone in New York. ROBINSON further admitted that he was not able to possess firearms because he is a convicted felon and stated that his criminal history is "pretty bad."

11. Your affiant reviewed ROBINSON's criminal history which reveals that on or about November 18, 2020, ROBINSON was convicted of Felonious Assault With Deadly Weapon Inflicting Serious Injury, in violation of NC § 14-32(b), a Class E Felony, and sentenced


in Gaston County Court, North Carolina, to serve 24 to 41 months imprisonment. ROBINSON is currently on Parole in North Carolina.

Conclusion

12. Based upon the above information, there is probable cause to believe that on May 4, 2022, Cameron ROBINSON committed a violation of Title 18, United States Code, Section 922(g)(1)


Young Choi
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on May 7, 2022, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Daniel J. Stewart
U.S. Magistrate Judge